IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Case No. 4:20-cv-03081

Plaintiffs,

UNOPPOSED MOTION FOR EXTENSION OF DEADLINE

BOARD OF REGENTS OF THE UNIVERSITY OF NEBRASKA,

vs.

Defendant.

COMES NOW Defendant by and through its undersigned counsel, and respectfully requests that the deadline to file Reply Briefs in support of its Motion to Exclude Experts and Motion for Summary Judgment be extended from December 16, 2024, to December 27, 2024. In support, Defendant states as follows:

- 1. Defendant needs additional time to complete the Reply Briefs and respond to Plaintiffs' Response to the Statement of Material Facts and Additional Material Facts. The undersigned counsel is diligently working on preparing the responsive documents. The legal issues presented in the pending motions are several, and the factual record is substantial. In addition, the Plaintiffs' additional material facts include 167 paragraphs. The case contains large evidentiary record and each of the Plaintiffs present their own distinct and unique facts. Specifically, the evidentiary record utilized in the pending motions are approximately 123 documents. And, the parties have exchanged approximately 12,000 pages of documents and multiple audio records with hours of transcribed content. Undersigned counsel is diligently working through the documents and working on addressing the various legal issues.
- 2. This extension will continue to accommodate Defendant's counsel's other current caseload, which includes, but is not limited to appellate briefing and depositions.
- 3. Defendant's counsel reached out to opposing counsel on December 4 and 12, 2024, and they are unopposed to said extension.

4. Defendant is working diligently to comply with all deadlines. The enlargement of time requested will not cause any undue hardship or prejudice to any party. This is the final extension Defendant will seek.

WHEREFORE, Defendant respectfully requests that this Court extend the above deadline for Reply Briefs in support of its Motion to Exclude Experts and Motion for Summary Judgment to December 27, 2024.

DATED this 12th day of December, 2024.

BOARD OF REGENTS OF THE UNIVERSITY OF NEBRASKA, Defendant

By: /s/ Lily Amare Susan K. Sapp #19121

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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

<u>/s/ Lily Amare</u> Lily Amare